

COHEN & GREEN

September 11, 2023

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

My firm, with co-counsel, represents Plaintiff in the case named above. I write briefly regarding Defendants' response (Dkt. No. 122) to Plaintiff's motion to compel discovery (Dkt. No. 117). If the Court believes anything in particular¹ in Defendants' response warrants a further response, we are happy to address it.

That said, this letter is simply to point out that beyond compelling production of documents withheld, Plaintiff's motion sought to compel (1) a nearly-year overdue privilege log (Dkt. No. 117 at 8; *also mentioned specifically in*, Dkt. No. 120 at 3); (2) verified interrogatory responses (Dkt. No. 117 at 8-9); and (3) the completion of the ten searches that Defendants stated were ongoing in their most recent responses (*id.* at 8). Defendants do not object to any of these requests for relief or even address them, so the Court should — at a minimum — grant that relief.

As always, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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¹ For example, how Defendants' admissions that it took weeks of "diligent[]" work to even "understand all the information that has been produced as well as the bases for objections" (Dkt. No. 120 at 2) and that they were refusing to "explain what was being withheld" (Dkt. No. 122 at 2) could be squared with the commitments in Dkt. No. 84 or Judge Peck's decision *Fischer* incorporated therein.



cc:

All relevant parties by electronic filing.